

EXHIBIT D

11/26/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.
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Logan Kerr

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE MATTER OF:)
RICHARD KADREY, et al.,)
Plaintiff,)
vs.) C.A. NO.:
META PLATFORMS, INC.,) 3:23-cv-03417-VC
Defendant.)
)

** HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY **

VIDEOTAPED DEPOSITION OF LOGAN KERR

San Francisco, California

Tuesday, November 26, 2024

Stenographically Reported by:

HEATHER J. BAUTISTA, CSR, CRR, RPR, CLR

Realtime Systems Administrator

California CSR License #11600

Oregon CSR License #21-0005

Washington License #21009491

Nevada CCR License #980

Texas CSR License #10725

DIGITAL EVIDENCE GROUP
1730 M. Street, NW, Suite 812
Washington, D.C. 20036
(202) 232-0646

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1 training model when somebody prompted something
2 negative or something that we didn't want to respond
3 to, to not be helpful in that circumstance and
4 instead provides sort of a soft rebuttal to the
5 user.

6 Q. And was all that data written by people
7 that you had hired?

8 A. That is my understanding.

9 Q. And what were some of the prompts that the
10 model was trained not to engage in or, as you put
11 it, to not respond helpfully?

12 A. I want to be conscious about not revealing
13 conversations with Legal here. I can give an
14 example, if that's helpful, but I'd rather not. I
15 don't think I can talk about categories necessarily.

16 Q. Yeah. I would -- I would dispute that the
17 final product or even the product that you worked on
18 would be privileged. I certainly wouldn't want you
19 to reveal any conversations or any substance of
20 conversations with counsel, but unless you're being
21 specifically told by counsel not to tell us these
22 categories, then I'd -- then I'd like for you to